

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

INTERNATIONAL FINANCE CORPORATION,  
not in its individual capacity but solely as the  
Trustee for the IFC-Netherlands Carbon Facility  
2121 Pennsylvania Avenue, N.W.,  
Washington, DC 20433,

*Plaintiff,*

-against-

KORAT WASTE TO ENERGY CO. LTD.,  
(a/k/a KHORAT WASTE TO ENERGY CO.)  
571/11 Moo 3, Suranaree Industrial Zone,  
Tambon NongBausala, Amphur Muang District,  
Nakorn Ratchasima, 30000, Thailand,

*Defendant.*

07 Civ. 5451 (SHS) (ECF)

**NOTICE OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

FILED  
U.S. DISTRICT COURT  
2008 MAR 31 PM 2:33  
S.D. of N.Y.

*To the above-named Plaintiff:*

PLEASE TAKE NOTICE THAT, pursuant to Rule 1.3(c) of the Local  
Rules of the United States District Courts for the Southern and Eastern Districts of New  
York, Thomas M. Keane, a member in good standing of the bar of this Court, hereby  
moves for an Order allowing the admission *pro hac vice* of:

Amanda Ward Gilbert  
Wallace King Domike & Reiskin, PLLC  
1050 Thomas Jefferson St., NW  
Washington, DC 20007  
Phone: (202) 204-1000  
Fax: (202) 204-1001

Ms. Gilbert is a member in good standing of the bar of the State of Illinois.

MAR 31 2008

07-646234

There are no pending disciplinary proceedings against Ms. Gilbert.

Dated: March 28, 2008  
New York, New York

MORVILLO, ABRAMOWITZ, GRAND,  
IASON, ANELLO & BOHRER, P.C.

By: 

Elkan Abramowitz (EA-3987)

Thomas M. Keane (TK-6320)

565 Fifth Avenue

New York, New York 10017

Phone: (212) 856-9600

Fax: (212) 856-9494

*Attorneys for Defendant*

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*Defendant.*

07 Civ. 5451 (SHS) (ECF)

**AFFIDAVIT OF  
THOMAS M. KEANE  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

STATE OF NEW YORK     )  
                                      )     ss.:  
COUNTY OF NEW YORK    )

THOMAS M. KEANE, being duly sworn, deposes and says:

1. I am an attorney with the firm of Morvillo, Abramowitz, Grand, Iason, Anello & Bohrer, P.C., counsel for defendant in the above-captioned action. I am familiar with the proceedings in this case. I make this statement in support of defendant's motion to admit Amanda Ward Gilbert as counsel *pro hac vice* to represent defendant in this action.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1998. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Ms. Gilbert is associated with the firm of Wallace King Domike & Reiskin, PLLC, in Washington, DC. She is a member in good standing of the bar of the State of Illinois. A copy of a Certificate of Good Standing from the State of Illinois, issued within 30 days of the date hereof, is attached hereto as exhibit A.

4. I am informed and believe that Ms. Gilbert is a skilled attorney and a person of integrity. She is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure.

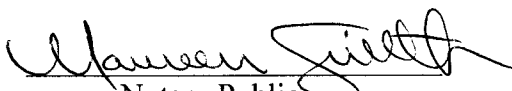
5. Accordingly, I am pleased to move the admission of Amanda Ward Gilbert, *pro hac vice*.

6. I respectfully submit a proposed Order granting the admission of Amanda Ward Gilbert, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Amanda Ward Gilbert, *pro hac vice*, to represent defendant in the above-captioned matter, be granted.

  
THOMAS M. KEANE

Sworn to before me this  
28 day of March, 2008

  
Notary Public  
MAUREEN SMITH  
Notary Public, State of New York  
No. 01SM5077496  
Qualified in Kings County  
Commission Expires May 12, 20 11

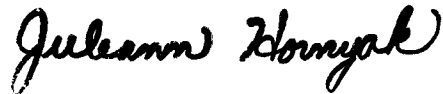
## **Certificate of Admission To the Bar of Illinois**

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Amanda Ward Gilbert

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 9, 2006 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto  
placed my hand and affixed the seal  
of said Supreme Court, at Springfield,  
in said State, this Thursday, March 20, 2008.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

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**ORDER FOR ADMISSION  
OF COUNSEL PRO HAC VICE**

Upon the motion of Thomas M. Keane, attorney for defendant, and said  
sponsor attorney's affidavit in support,

IT IS HEREBY ORDERED that:

Amanda Ward Gilbert  
Wallace King Domike & Reiskin, PLLC  
1050 Thomas Jefferson St., NW  
Washington, DC 20007  
Phone: (202) 204-1000  
Fax: (202) 204-1001  
agilbert@wallaceking.com

is admitted to practice *pro hac vice* as counsel for defendant Korat Waste to Energy Co.  
Ltd. in the above-captioned case in the United States District Court for the Southern  
District of New York.

All attorneys appearing before this Court are subject to the Local Rules of  
this Court, including the Rules governing discipline of attorneys.

Counsel shall apply immediately for a password for the Court's Electronic Case Filing system and shall forward the *pro hac vice* fee to the Clerk of the Court.

IT IS SO ORDERED this \_\_\_\_ day of April, 2008

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Sidney H. Stein, U.S.D.J.

**CERTIFICATE OF SERVICE**

I hereby certify that, on March 28, 2008, I caused a copy of defendant's foregoing Notice of Motion to Admit Counsel Pro Hac Vice, with the Supporting Affidavit of Thomas M. Keane and the exhibits thereto, to be sent via e-mail and U.S. Mail first class, postage-prepaid, to plaintiff's counsel of record:

Francis A. Vasquez, Jr., Esq.  
WHITE & CASE, LLP  
701 Thirteenth Street, N.W.  
Washington, DC 20005  
fvasquez@whitecase.com

Dated: New York, New York  
March 28, 2008

  
\_\_\_\_\_  
THOMAS M. KEANE